

## Attachment 2. Action Item Permit References

Actions	Permit Reference
Action Item 1: Develop and establish authority to implement pesticide plan.	14.b ...The Permittees shall adopt and verify implementation of policies, procedures, and/or ordinances requiring the minimization of pesticide use and the use of Integrated Pest Management (IPM) techniques in the Permittee's operations <i>that have the potential to reach waters of the State...</i>
Action Item 2: Develop a "tool box" for the Pesticide Plan.	implementing step, not permit requirement
Action Item 3: Document and report pesticide use.	14.b ...a program to quantitatively identify each Permittee's pesticide use by preparing a periodically updated inventory of pesticides used by all internal departments, divisions, and other operational units as applicable to each Permittee.
Action Item 4: Review and revise internal policies and procedures to ensure full documentation of pesticide use.	14.b ...a program to quantitatively identify each Permittee's pesticide use by preparing a periodically updated inventory of pesticides used by all internal departments, divisions, and other operational units as applicable to each Permittee
Action Item 5: Require Oversight by Certified Pesticide Applicator.	14.b ...municipal employees who apply pesticides in their jurisdictions...apply pesticides only under the supervision of a certified pesticide applicator.
Action Item 6: Establish/conduct training program for pesticide applicators.	14.b ...municipal employees who apply pesticides in their jurisdictions receive annual training...
Action Item 7: Develop and adopt Permittee-specific IPM policies, procedures, or ordinances.	14.b ...policies, procedures, and/or ordinances requiring the minimization of pesticide use and the use of Integrated Pest Management (IPM) techniques.  C.10.D. Each Permittee shall prepare and implement a standardized protocol for routine and non-routine application of pesticides, herbicides (including pre-emergents), and fertilizers ...
Action Item 8: Ensure coverage under Aquatic Pesticide Permit.	Permit finding #66. It is necessary to obtain a NPDES permit for application of aquatic pesticides to waterways... Public entities that conduct such activities must seek coverage under this general permit.
Action Item 9: Coordinate with Sacramento-Yolo Mosquito and Vector Control District.	Finding #12. "... cooperate and collaborate with local vector control agencies ... for the implementation, operation, and maintenance of treatment control BMPs in order to minimize the risk to public health from vector borne diseases."
Action Item 10: Continue to support local IPM outreach and education programs, such as Water Wise Program and Our Water Our World.	14.b.i ...Public outreach programs. Such programs shall be designed for residential and commercial pesticide users and pest control operators.
Action Item 11: Continue to support Household Hazardous Waste programs.	14.b.iv ...Coordination with household hazardous waste collection agencies. The Permittees shall support, enhance, and help publicize

	programs for proper pesticide disposal.
Action Item 12: Encourage incorporation of IPM in design of new development landscaping and buildings.	14.b.iii ...Mechanisms to encourage the consideration of pest-resistant landscaping and design features in the design, landscaping, and/or environmental reviews of proposed development projects. Education programs shall target individuals responsible for these reviews and focus on factors affecting water quality impairment.
Action Item 13: Include pesticide information in stormwater outreach campaign.	14.b.i ...Public outreach programs. Such programs shall be designed for residential and commercial pesticide users and pest control operators.
Action Item 14: Promote implementation of IPM by Institutional Pesticide Users.	optional. 14.b.i ...Public outreach programs. Such programs shall be designed for] residential and commercial pesticide users and pest control operators.  Permit Finding #12. This Order expects the Permittees to closely cooperate and collaborate with local vector control agencies and the State Department of Health Services for the implementation, operation, and maintenance of treatment control BMPs in order to minimize the risk to public health from vector borne diseases.
Action Item 15: Consider other IPM outreach efforts.	optional
Action Item 16: Continue regulation by the County Agricultural Commissioner.	Existing activity, not permit requirement
Action Item 17: Continue to enforce local prohibitions against illegal discharges.	Existing activity, not permit requirement
Action Item 18: Promote IPM implementation by PCOs.	14.b.i ...Public outreach programs. Such programs shall be designed for residential and commercial pesticide users and pest control operators.  C.9.ii.c. Each Permittee shall develop and maintain an inventory or database of potentially significant sources of unauthorized non-storm water discharges and/or storm water pollution within its jurisdiction...For educational outreach purposes, the inventory or database shall include the following businesses that may create temporary or intermittent sources of unauthorized non-storm water discharges and/or storm water pollution in varied locations: automotive washing and detailing, carpet cleaning, commercial pesticide application,
Action Item 19: Continue conducting water quality monitoring.	Existing activities under Monitoring Program.  14.b ...additional diazinon and chlorpyrifos monitoring and toxicity testing in Arcade Creek, Chicken/Strong Ranch Sloughs, Elder Creek, Elk Grove Creek, Morrison Creek, and Natomas East Main Drain.
Action Item 20: Continue to track relevant monitoring programs by other agencies.	14.b ...Existing activity, not permit requirement.
Action Item 21: Conduct Residential Pesticide Sales and Use Surveys.	14.b.ii ...Periodic surveys of the local or regional sales and use of

	residential ... products potentially found in storm water runoff.
Action Item 22: Evaluate PCO pesticide use data.	14.b.ii ...Periodic surveys of the ... commercial pest control products potentially found in storm water runoff.
Action Item 23: Continue evaluating program progress and effectiveness.	14.b ... a mechanism for reviewing and amending the plan, as necessary, in subsequent years.
Action Item 24: Evaluate target pollutants.	Existing activity  14.b ...a mechanism for reviewing and amending the plan, as necessary, in subsequent years.
Action Item 25: Continue tracking and commenting as appropriate on State and Federal regulatory activities that pertain to pesticides of significance to urban stormwater discharges.	14.b ...monitor USEPA and Department of Pesticide Regulation (DPR) activities related to the registration of pesticide products and uses
Action Item 26: Continue providing input for pesticide product risks to surface water quality.	14.b ...assess which pesticide products and uses pose the greatest risks to surface water quality.
Action Item 27: Continue participating in development of TMDL for pesticides in Sacramento urban creeks.	14.b ... The Permittees will participate in stakeholder forums and collaborative technical studies necessary to assist the Regional Board in completing the TMDLs.  14.b. ...additional diazinon and chlorpyrifos monitoring and toxicity testing in Arcade Creek, Chicken/Strong Ranch Sloughs, Elder Creek, Elk Grove Creek, Morrison Creek, and Natomas East Main Drain.
Action Item 28: Continue supporting improvements in State and Federal pesticide regulations.	optional, not permit requirement